

1 STEPHANIE YONEKURA
2 Acting United States Attorney
3 ROBERT E. DUGDALE
4 Assistant United States Attorney
5 Chief, Criminal Division
6 STEVEN R. WELK
7 Assistant United States Attorney
8 Chief, Asset Forfeiture Section
9 VICTOR A. RODGERS
10 California Bar No. 101281
11 Assistant United States Attorney
12 Asset Forfeiture Section
13 Federal Courthouse, 14th Floor
14 312 North Spring Street
15 Los Angeles, California 90012
16 Telephone: (213) 894-2569
17 Facsimile: (213) 894-7177
18 E-mail: Victor.Rodgers@usdoj.gov

JS-6

11 Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

16 UNITED STATES OF AMERICA,) No. CV 11-5096-SJO(RZx)
17 Plaintiff,)
18 v.) **CONSENT JUDGMENT OF FORFEITURE**
19 \$24,930.00 IN U.S.)
CURRENCY,)
20 Defendant.)
21 _____)
22 ALEX GHATIS HALAWI,)
23 Claimant.)

On or about June 17, 2011, Plaintiff United States of America ("the government," "the United States of America" or "plaintiff") filed a Complaint for Forfeiture alleging that the

1 defendant \$24,930.00 in U.S. Currency (the "defendant currency")
2 is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

3 Claimant Alex Ghatis Halawi ("claimant") filed a claim to
4 the defendant currency on or about August 18, 2011 and an answer
5 to the Complaint on or about May 14, 2014. Former claimant
6 Mohammed Hasan Farha filed a claim to the defendant currency on
7 or about August 18, 2011 and an answer to the Complaint on or
8 about May 14, 2014. However, former claimant Mohammed Hasan
9 Farha withdrew his claim with prejudice by filing a withdrawal
10 of claim on or about August 25, 2014. Accordingly, former
11 claimant Mohammed Hasan Farha is no longer a party to this
12 action. No other parties have appeared in this case and the
13 time for filing claims and answers has expired.

14 The government and claimant have now agreed to settle this
15 action without any admission of any wrongdoing and to avoid
16 further litigation by entering into this Consent Judgment of
17 Forfeiture.

18 The Court, having been duly advised of and having
19 considered the matter, and based upon the mutual consent of the
20 parties hereto,

21 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

22 1. This Court has jurisdiction over the subject matter of
23 this action and the parties to this Consent Judgment of
24 Forfeiture.

25 2. The Complaint for Forfeiture states a claim for relief
26 pursuant to 21 U.S.C. § 881(a)(6).

27 3. Notice of this action has been given as required by
28 law. Except for the claim filed by former claimant Mohammed

1 Hasan Farha which was withdrawn with prejudice on or about
2 August 25, 2014, no appearances have been made in the litigation
3 by any person other than claimant. The Court deems that all
4 other potential claimants admit the allegations of the Complaint
5 for Forfeiture to be true.

6 4. The sum of \$5,900.00 only (without interest) shall be
7 returned to claimant. The remainder of the defendant currency
8 (i.e., \$19,030.00), plus the interest earned by the United
9 States of America on the defendant currency shall be condemned
10 and forfeited to the United States of America, which shall
11 dispose of those funds in accordance with law.

12 5. The funds to be returned to claimant pursuant to
13 paragraph 4 above shall be paid to claimant by electronic
14 transfer directly into the client trust account of Jacek W.
15 Lentz, attorney of record for claimant in this case. Claimant
16 (through his attorney of record Jacek W. Lentz, Esq.) shall
17 provide all information and complete all documents requested by
18 the United States of America in order for the United States of
19 America to complete the transfer including, without limitation,
20 providing claimant's social security and taxpayer identification
21 numbers (if any), claimant's attorney of record's taxpayer
22 identification number, and the identity of the bank, the bank's
23 address and the account name, account number, account type and
24 wire transfer routing number for the Jacek W. Lentz client trust
25 account to which the transfer of funds is to be made.

26 6. Claimant hereby releases the United States of America,
27 its agencies, agents, officers, employees and representatives,
28 including, without limitation, all agents, officers, employees

1 and representatives of the Drug Enforcement Administration or
2 the Department of Justice and their respective agencies, as well
3 as all agents, officers, employees and representatives of any
4 state or local governmental or law enforcement agency involved
5 in the investigation or prosecution of this matter, from any and
6 all claims, actions or liabilities arising out of or related to
7 this action, including, without limitation, any claim for
8 attorney fees, costs and interest, which may be asserted by or
9 on behalf of claimant, whether pursuant to 28 U.S.C. § 2465 or
10 otherwise.

11 7. The Court finds that there was reasonable cause for
12 the seizure of the defendant currency and institution of these
13 proceedings. This judgment shall be construed as a certificate
14 of reasonable cause pursuant to 28 U.S.C. § 2465.

15 8. The Court further finds that claimant did not
16 substantially prevail in this action, and the parties hereto
17 shall bear their own attorney fees and costs.

September 9, 2014.

Dated:

S. James Oten

THE HONORABLE S. JAMES OTERO
UNITED STATES DISTRICT JUDGE

CONSENT

The parties hereto consent to the above judgment and waive any right of appeal.

Dated: August 26, 2014

STEPHANIE YONEKURA
Acting United States Attorney
ROBERT E. DUGDALE
Assistant United states Attorney
Chief, Criminal Division
STEVEN R. WELK
Assistant United States Attorney
Chief, Asset Forfeiture Section

/s/ Victor A. Rodgers

VICTOR A. RODGERS
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

Dated: August 26, 2014

LAW OFFICES OF JACEK W. LENTZ

/s/ Jacek W. Lentz
JACEK W. LENTZ

Attorneys for Claimant
ALEX GHATIS HALAWI and former
Claimant MOHAMMED HASAN FARHA